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GEO GUIDANCE DRILLING SERVICES, INC.

10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**

12 GEO GUIDANCE DRILLING SERVICES,
13 INC., a California corporation,

14 Plaintiff,

15 v.

16 RENAISSANCE RESOURCES, LLC, a
17 Wyoming limited liability company,

18 Defendant.

Case No. 1:20-CV-00465-BAK (EPG)

**JOINT STIPULATION RE: MEET AND
CONFER AND RE-SETTING OF
SETTLEMENT CONFERENCE;
ORDER**

(Doc. 42)

20 **COMES NOW** Plaintiff GEO GUIDANCE DRILLING SERVICES, INC., a California
21 corporation (“Plaintiff”), and Defendant RENAISSANCE RESOURCES, LLC, a Wyoming
22 limited liability company (“Defendant”), by and through each Party’s counsel of record, and
23 submit to the Court this Joint Stipulation and Order for purposes of the Parties stipulating and
24 agreeing to the following: (1) over the course of forty-five (45) days from the date of the Court’s
25 Order with respect hereto, the Parties shall engage in good faith meet and confer efforts to discuss
26 and/or negotiate damages at issue, settlement and resolution, and all other matters at issue with
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1 respect to this action, and (2) setting forth mutually convenient and agreeable dates to set and hold
2 a Further Settlement Conference.

3 Accordingly, the Parties set forth the following Joint Stipulation, by and through their
4 respective counsel of record, as follows:

5 **RECITALS**

6 **WHEREAS**, on March 15, 2022, counsel of record for the Parties participated in a Pre-
7 Settlement Conference teleconference call with Magistrate Judge Sheila K. Oberto to discuss the
8 March 22, 2022 Settlement Conference and matters associated with and at issue in this action,
9 including, but not limited to, the status of discussions and/or negotiations by and between the
10 Parties with respect to damages, settlement and resolution, and all other matters related to this
11 action and claims at issue.

12 **WHEREAS**, during the teleconference held on March 15, 2022, Magistrate Judge Sheila
13 K. Oberto ruled to remove the March 22, 2022 Settlement Conference, and ordered the Parties to
14 prepare and file a Joint Stipulation setting forth meet and confer efforts and action to be taken
15 during forty-five (45) days from the date of entry of Order with respect to this Joint Stipulation, as
16 well as selecting and setting forth potential dates for a Further Settlement Conference.

17 **WHEREAS**, on March 16, 2022, Magistrate Judge Sheila K. Oberto issued a Minute
18 Order regarding the rulings advanced during the March 15, 2022 teleconference call.

19 **WHEREAS**, the Parties stipulate and agree to engage in good faith settlement
20 negotiations and discussions over the next forty-five (45) days from the date of entry of the
21 Court's Order with respect hereto, including the development and preparation of a Settlement
22 Agreement and/or Stipulated Judgment with respect to settlement and resolution reached, if any
23 and able.

24 **WHEREAS**, the Parties stipulate and agree to provide a Joint Status Report to the Court
25 no later than five (5) days prior to the expiration of the forty-five (45) day meet and confer period.

26 **WHEREAS**, the Parties stipulate and agree that, in the event necessary, they will
27 participate in a Further Settlement Conference to be set by the Court as requested below.

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2 **STIPULATION**

3 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by and
4 between the parties, by and through their respective counsel of record, as follows:

5 1. That the Parties will engage in good faith, meet and confer efforts, negotiations,
6 and discussions with respect to settlement and resolution of this action over forty-five (45) days
7 from the date of entry of the Court's Order with respect to this Joint Stipulation, and undertake
8 any and all necessary actions related thereto and directed towards bringing this matter to a full and
9 complete resolution, including the development and preparation of a Settlement Agreement and/or
10 Stipulated Judgment with respect to settlement and resolution reached, if any and able.

11 2. That the Parties will prepare, submit, and file a Joint Status Report with the Court
12 no later than five (5) days prior to the expiration of the forty-five (45) day meet and confer period.

13 3. That the Court set a Further Settlement Conference on May 17, 2022, May 19,
14 2022, May 31, 2022, or June 2, 2022, or on the first available date and time thereafter that is
15 convenient to the Court.

16 4. That Further Settlement Conference set by the Court be held via Zoom or other
17 remote means acceptable to the Court.

18 5. In the event that the Parties are unable to obtain full and complete settlement prior
19 to or during the Further Settlement Conference, the Parties will request that the Court re-set this
20 matter for trial including, but not limited to, scheduling all dates and deadlines associated
21 therewith.

22 **[SIGNATURES ON FOLLOWING PAGE]**

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1 Dated: March 21, 2022

BELDEN BLAINE RAYTIS, LLP

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4
5 /s/ Daniel M. Root

6 By:

7 T. SCOTT BELDEN
8 DANIEL N. RAYTIS
9 DANIEL M. ROOT
10 Attorneys for Plaintiff GEO
11 GUIDANCE DRILLING SERVICES,
12 INC.

13
14
15 Dated: March 21, 2022

16 WOOD SMITH HENNING BERMAN,
17 LLP

18 /s/ Peter J. Burfening

19 By:

20 PETER J. BURFENING, JR.,
21 Attorneys for Defendant
22 RENAISSANCE RESOURCES, LLC
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ORDER

Having read and considered the Joint Stipulation entered into and submitted by the Parties by and through their respective counsel of record (Doc. 42), and good cause appearing, **THE COURT ORDERS AS FOLLOWS:**

1. The Parties shall engage in good faith, meet and confer efforts, negotiations, and discussions with respect to settlement and resolution of this action over forty-five (45) days from the date of entry of this Order and undertake all reasonably necessary actions related thereto and directed towards bringing this matter to a full and complete resolution, including the development and preparation of a Settlement Agreement and/or Stipulated Judgment with respect to settlement and resolution reached, if any and able.

2. The Parties shall prepare, submit, and file a Joint Status Report with the Court no later than five (5) days prior to the expiration of the forty-five (45) day meet and confer period.

3. A Further Settlement Conference in this action is set for **June 21, 2022, at 10:00 AM** before Magistrate Judge Sheila K. Oberto. A written order will follow.

4. In the event that the Parties are unable to obtain full and complete settlement prior to or during the Further Settlement Conference, the Parties shall file a request that the Court re-set this matter for trial including, but not limited to, scheduling all dates and deadlines associated therewith.

IT IS SO ORDERED.

Dated: **March 21, 2022**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE